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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

FREE RANGE CONTENT, INC., a California
corporation, COCONUT ISLAND
SOFTWARE, INC., a Hawaii corporation,
TAYLOR CHOSE, a Minnesota resident, and
MATTHEW SIMPSON, a British Columbia,
Canada resident, on behalf of themselves and all
others similarly situated,

Plaintiffs,

v.

GOOGLE LLC, a Delaware limited liability
company,

Defendant.

No. 5:14-cv-02329-BLF

**JOINT STIPULATED REQUEST
AND ~~PROPOSED~~ ORDER TO
CONTINUE DEADLINES FOR
PRELIMINARY APPROVAL OF
SETTLEMENT**

Date: April 27, 2018
Time: 9:00 a.m.
Judge: Hon. Beth Labson Freeman
Dept.: Courtroom 3, 5th Floor

1 This stipulation is entered into by and between Free Range Content, Inc., Coconut Island
2 Software, Inc., Taylor Chose, and Matthew Simpson (“Plaintiffs”) and Google LLC (“Google”)
3 (collectively, “the Parties”), by and through their respective counsel:

4 WHEREAS, on January 9, 2018, having been advised previously that the Parties had reached
5 a settlement in principle of this class action, the Court issued an order accepting the parties’ proposed
6 schedule for preliminary approval, with the exception of the hearing date, which the Court set for
7 April 5, 2018 (Dkt. No. 239);

8 WHEREAS, on January 25, 2018, the Court, having been advised of a conflict on the part of
9 Google’s counsel with the April 5, 2018, hearing date, re-set the hearing date to April 27, 2018, at
10 9:00 a.m., Dkt. No. 241. At the Parties’ stipulated request, the Court also extended the due-date for
11 Plaintiffs’ motion for preliminary approval by one week, such that the schedule is currently as
12 follows:

Event	Date
Motion for Preliminary Approval	February 22, 2018
Response, if any	March 12, 2018
Reply, if any	March 19, 2018
Hearing, if any	April 27, 2018 at 9:00 a.m.

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16 WHEREAS, the Court has previously granted requests for scheduling extensions and
17 modifications as detailed in paragraph 8 of the accompanying Robert F. Lopez (“Lopez Decl.”), and
18 the Parties have neither stipulated to nor moved for any additional modifications of time (Lopez
19 Decl., ¶ 8);

20 WHEREAS, Civil Local Rule 6-2(a) permits parties to file a stipulation requesting an order
21 changing time that affects the date of an event or deadline set by Court order;

22 WHEREAS, the Parties have cooperated toward all tasks necessary to enable Plaintiffs to file
23 their motion for preliminary approval and all supporting papers by February 22, 2018;

24 WHEREAS, the Parties would be greatly aided by an additional week’s time to continue
25 working through the final details of the proposed notice and claim documents; and

26 WHEREAS, a week’s additional time will not affect the currently scheduled hearing date of
27 April 27, 2018, which the Parties do not seek to change;

NOW THEREFORE, pursuant to Civil Local Rule 6-2(a), Plaintiffs and Google jointly make the stipulated request that the Court enter an order modifying the schedule for preliminary approval as follows:

Event	Date
Motion for Preliminary Approval	March 1, 2018
Response, if any	March 15, 2018
Reply, if any	March 22, 2018
Hearing, if any	April 27, 2018 at 9:00 a.m.

IT IS SO STIPULATED.

Dated: February 21, 2018

HAGENS BERMAN SOBOL SHAPIRO LLP
STEVE W. BERMAN (*pro hac vice*)
ROBERT F. LOPEZ (*pro hac vice*)

/s/ Robert F. Lopez
Robert F. Lopez
Attorneys for Plaintiffs and Class Counsel

Dated: February 21, 2018

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KYLE C. WONG (224021)

/s/ Jeffrey M. Gutkin
Jeffrey M. Gutkin
Attorneys for Defendant
GOOGLE LLC

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: February 21, 2018

Beth Labson Freeman
THE HONORABLE BETH LABSON FREEMAN
UNITED STATES DISTRICT JUDGE